

OCT 03 2022

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

UNITED STATES OF AMERICA

v.

[1] CHESTER GALLAGHER  
[2] HEATHER IDONI  
[3] CALVIN ZASTROW  
[4] COLEMAN BOYD  
[5] CAROLINE DAVIS  
[6] PAUL VAUGHN  
[7] DENNIS GREEN  
[8] EVA EDL  
[9] EVA ZASTROW  
[10] JAMES ZASTROW  
[11] PAUL PLACE

No. 3:22-00327

18 U.S.C. § 2  
18 U.S.C. § 241  
18 U.S.C. § 248(a)(1)

  
DEPUTY CLERK

**MOTION TO SEAL INDICTMENT**

The United States of America, by and through Mark H. Wildasin, United States Attorney, and Amanda J. Klopff, Assistant United States Attorney, hereby moves this Court to seal the indictment in this case.

Seven of the defendants who are charged in the indictment returned today, are charged with: Conspiracy to injure, oppress, threaten, and intimidate patients and employees of the Clinic in the Middle District of Tennessee in the free exercise and enjoyment of the rights and privileges secured to them by the laws of the United States – namely, the right to obtain and seek to obtain, and to provide and seek to provide, reproductive health services, as provided by 18 U.S.C. § 248(c)(1), in violation go 18 U.S.C. § 241. All eleven defendants are charged with misdemeanor violation of the FACE Act, 18 U.S.C. § 248(a)(1) and 2.

The defendants are not in custody, and if the indictment is not sealed until such time as

they are arrested, they will pose a flight risk.

WHEREFORE, for the above reasons, the United States respectfully requests the indictment be sealed as described in the attached proposed Order.

Dated: October 3, 2022

Respectfully submitted,

MARK H. WILDASIN  
United States Attorney  
Middle District of Tennessee

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